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13 Attorneys for Defendants, Counterclaimants, and
14 Third Party Plaintiffs PCJV USA, LLC, PCI
15 TRADING LLC, POTATO CORNER, LA
16 GROUP, LLC, GK CAPITAL GROUP, LLC,
17 NKM CAPITAL GROUP, LLC and GUY
18 KOREN, and Defendants J & K AMERICANA,
19 LLC, J&K LAKEWOOD, LLC, J&K
20 OAKRIDGE, LLC, J&K VALLEY FAIR, LLC, J
21 & K ONTARIO, LLC, J&K PC TRUCKS, LLC,
22 HLK MILPITAS, LLC, and GK CERRITOS, LLC

13
14 **UNITED STATES DISTRICT COURT**
15 **CENTRAL DISTRICT OF CALIFORNIA**

16 SHAKEY'S PIZZA ASIA VENTURES,
17 INC, a Philippines corporation,

18 Plaintiff,

19 vs.

20 PCJV USA, LLC, a Delaware limited
21 liability company; PCI TRADING, LLC, a
22 Delaware limited liability company; GUY
23 KOREN, an individual; POTATO CORNER
24 LA GROUP, LLC, a California limited
25 liability company; NKM CAPITAL GROUP,
26 LLC, a California limited liability company;
27 J & K AMERICANA, LLC, a California
28 limited liability company; J&K
LAKEWOOD, LLC, a California limited
liability company; J&K VALLEY FAIR,
LLC, a California limited liability company;
J & K ONTARIO, LLC, a California limited
liability company; HLK MILPITAS, LLC, a
California, limited liability company; GK
CERRITOS, LLC, a California, limited
liability company; J&K PC TRUCKS, LLC,
a California limited liability company; and,

Case No. 2:24-CV-04546-SB(AGRx)

Hon. Stanley Blumenfeld, Jr.

**SUPPLEMENTAL
DECLARATION OF ADAM
MANDEL**

Date: February 28, 2025

Time: 8:30 a.m.

Courtroom: 6C

Complaint Filed: May 31, 2024

Trial Date: August 4, 2025

1 GK CAPITAL GROUP, LLC, a California
2 limited liability company and DOES 1
3 through 100, inclusive,

4 Defendants.
5

6 PCJV USA, LLC, a Delaware limited
7 liability company; PCI TRADING LLC, a
8 Delaware limited liability company;
9 POTATO CORNER LA GROUP LLC, a
10 California limited liability company; GK
11 CAPITAL GROUP, LLC, a California
12 limited liability company; NKM CAPITAL
13 GROUP LLC, a California limited liability
14 company; and GUY KOREN, an individual,

15 Counter-Claimants,
16

17 v.
18

19 SHAKEY'S PIZZA ASIA VENTURES,
20 INC, a Philippines corporation,

21 Counter Defendant.
22

23 PCJV USA, LLC, a Delaware limited
24 liability company; PCI TRADING LLC, a
25 Delaware limited liability company;
26 POTATO CORNER LA GROUP LLC, a
27 California limited liability company; GK
28 CAPITAL GROUP, LLC, a California
limited liability company; NKM CAPITAL
GROUP LLC, a California limited liability
company; and GUY KOREN, an individual,

29 Third Party Plaintiffs,
30

31 v.
32

33 PC INTERNATIONAL PTE LTD., a
34 Singapore business entity; SPAVI
35 INTERNATIONAL USA, INC., a California
36 corporation; CINCO CORPORATION, a
37 Philippines corporation; and ROES 1 through
38 10, inclusive,

39 Third Party Defendants.
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SUPPLEMENTAL DECLARATION OF ADAM MANDEL

I, Adam Mandel, declare as follows:

1. I am the acting Chief Operating Officer for PCJV USA, LLC (“PCJV”).

I file this declaration to supplement the papers we filed two weeks ago. I have personal knowledge of the facts set forth in this declaration, and if called upon to testify under oath, I could and would competently do so.

2. As much of the recent efforts have involved landlords, Ms. Grudnowski has been the lead point person on those matters and her declaration filed concurrently herewith supplies updated information regarding status. For the units under company control, I believe we have completed de-branding of Potato Corner marks (or are in the very final stage of completing being de-branded). This de-branding includes all case elements, paper goods, uniforms, and other non-permanent signage or items that require landlord approval.

3. Images of restaurant locations under company control I caused to be taken showing our de-brand efforts are attached collectively as Exhibit "1" to Ms. Grudnowski's Declaration.

4. Permanent signage elements (such as fixed signs, wallpaper or fascia signage at kiosks) have been submitted in shop drawings for mall approvals. We have contracted for installation and begun to prepare replacements some of which will be arriving next week. Upon receiving mall approvals, we will be able to quickly replace out these permanent signage elements.

I declare under penalty of perjury that the foregoing is true and correct.
Executed February 21, 2025, within the United States, its territories, possessions, or
commonwealths.

Signed by:

4410CB3179C1453
Adam Mandel

CERTIFICATE OF SERVICE

The undersigned certifies that on February 21, 2025, the foregoing document was electronically filed with the Clerk of the Court for the United States District Court, Central District of California, using the Court's Electronic Case Filing (ECF) system. I further certify that all participants in the case are registered CM/ECF users and that service will be accomplished by the CM/ECF system.

I certify under penalty of perjury that the foregoing is true and correct.
Executed on February 21, 2025.

By: /s/AJ Cruickshank